

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND-ODESSA DIVISION**

<b>TARA J. GONZALES,</b>	§	<b>CIVIL ACTION NUMBER</b>
	§	
<b>PLAINTIFF,</b>	§	
	§	
<b>V.</b>	§	<b>7:23-CV-20-DC-RCG</b>
	§	
<b>ODESSA COLLEGE,</b>	§	
	§	
<b>DEFENDANT.</b>	§	<b>JURY DEMANDED</b>

**PLAINTIFF’S DESIGNATION OF EXPERT WITNESSES**

Plaintiff Tara J. Gonzales files this Designation of Expert Witnesses pursuant to Federal Rule of Civil Procedure 26(a)(2) and the Scheduling Order entered in this case.

1. Plaintiff hereby designates the following individual as an expert on the issue of economic damages:

Bradley T. Ewing, Ph.D.  
3405 158th Street  
Lubbock, TX 79423  
(806) 543-9141

Please see Expert Report and CV produced separately.

2. Plaintiff hereby designates the following individuals as experts on the issue of attorneys’ fees and costs:

Holly B. Williams  
Williams Law Firm, PC  
1209 W Texas Ave  
Midland, TX 79701-6173  
(432) 682-7800

Ms. Williams is the attorney of record for Plaintiff in this case. She may testify as an expert witness regarding reasonable and necessary attorneys’ fees and costs. Ms. Williams has been licensed to practice law in Texas since 1993. She is Board Certified in Labor and Employment Law by the Texas Board of Legal Specialization. She will testify that rates and time incurred to date are reasonable and necessary. Ms. Williams has been maintaining contemporaneous time records which are available for review at the appropriate time based on reasonable notice and

opportunity to redact attorney work product. Upon trial of the case, Ms. Williams may testify as to an appropriate fee based on the “lodestar” factors. She cannot form her opinions until the trial is completed.

Brian Carney  
Carney Law Firm  
1202 W. Texas Ave.  
Midland, TX 79701  
(432) 686-8300

Mr. Carney is an attorney who practices in the areas of personal injury, criminal defense, civil rights, and labor and employment law in West Texas. He has been licensed to practice law in Texas since 1991. He may testify as an expert witness regarding reasonable and necessary attorneys’ fees and costs, including but not limited to reasonable and customary rates for attorneys and support staff in West Texas. He may testify as to an appropriate fee based on the “lodestar” factors. He cannot form his opinions until the trial is completed.

Christopher Charles Benoit  
Coyle & Benoit, PLLC  
2515 N. Stanton St.  
El Paso, TX 79902  
(915) 532-554

Mr. Benoit is an attorney who practices labor, employment, and civil rights law in West Texas and New Mexico. He has been licensed to practice law in Texas since 2009. He may testify as an expert witness regarding reasonable attorneys’ fees and costs, including, but not limited to, reasonable and customary rates for attorneys and support staff in West Texas. He may testify as to an appropriate fee based on the “lodestar” factors. He cannot form his opinions until the trial is completed.

Barry S. Hersh  
Hersh Law Firm, P.C.  
12377 Merit Drive, Suite 880  
Dallas, TX 75251  
(214) 303-1022

Mr. Hersh is an attorney who practices in the area of labor and employment law in throughout Texas. He has been licensed to practice law since 1998. He is Board Certified in Labor and Employment Law by the Texas Board of Legal Specialization. He may testify as an expert witness regarding reasonable and necessary attorneys’ fees and costs, including but not limited to reasonable and customary rates for attorneys and support staff in West Texas. He may testify as to an appropriate fee based on the “lodestar” factors. He cannot form his opinions until the trial is completed.

Enrique Chavez, Jr.  
Chavez Law Firm  
2101 N. Stanton  
El Paso, TX 79902  
(915) 315-7772

Mr. Chavez is an attorney who practices in the areas of personal injury and labor and employment law in West Texas. He has been licensed to practice law since 1997. He may testify as an expert witness regarding reasonable and necessary attorneys' fees and costs, including but not limited to reasonable and customary rates for attorneys and support staff in West Texas. He may testify as to an appropriate fee based on the "lodestar" factors. He cannot form his opinions until the trial is completed.

Also being provided is a copy of the 2023 Texas Employment Lawyers Association Attorneys' Fees Hourly Rates Yearbook – which is a detailed compilation of actual attorney fee awards in the State of Texas for employment law cases. Only the section for the Western District of Texas has been provided. Any or all of the attorneys may rely on the information in the Yearbook.

Respectfully submitted,

By: /s/ Holly B. Williams

Holly B. Williams

Texas Bar No. 00788674

**WILLIAMS LAW FIRM, P. C.**

1209 W. Texas Avenue

Midland, TX 79701

432-682-7800

432-682-1112 (fax)

[holly@williamslawpc.com](mailto:holly@williamslawpc.com)

**ATTORNEY FOR PLAINTIFF**

**TARA J. GONZALES**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 1, 2024, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Western District of Texas, using the electronic case filing (CM/ECF) system of the court.

By: /s/ Holly B. Williams  
Holly B. Williams